

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA,  
NORTHERN DIVISION**

LEE HARTWELL,

Plaintiff,

vs.

THE CITY OF MONTGOMERY and  
THE PERSONNEL BOARD FOR THE  
CITY AND COUNTY OF  
MONTGOMERY, and KELLY  
GORDON

Defendants.

Case No.: 2:06-CV-518

**PLAINTIFF LEE HARTWELL'S  
REQUESTED *VOIRE DIRE***

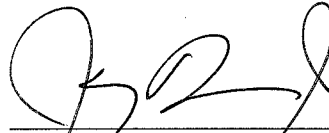
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DEBRA P. HACKETT, CLK  
U.S. DISTRICT COURT  
MIDDLE DISTRICT ALA

COMES NOW Lee Hartwell, the Plaintiff in the above styled action, by and through undersigned counsel, and requests that the following questions be asked of the jury panel prior to jury selection in the above styled case.

1. Does any member of the jury panel belong to an organization that promotes the preservation of the Confederate Battle Flag for its historical purposes, such as the sons of the Confederate Veterans?
2. Does any member of the jury panel belong to an organization that uses the Confederate Battle Flag as a symbol of the organization?
3. Has any member of the jury panel ever been disciplined by an employer for what you felt was exercising your right to freedom of speech?
4. Is there any member of the jury panel that believes that a person does not have a right to complain to his or her employer when another employee violates the employer's rules?

5. Is there any member of the jury panel that believes that a government employer, such as a municipality, has the right to punish an employee because of a complaint the employee made about another employee?

Respectfully submitted on this the 15<sup>th</sup> day of May, 2007.



J. BERNARD BRANNAN, JR. (BRA022)  
Attorney for the Plaintiff Lee Hartwell

OF COUNSEL:

THE BRANNAN LAW FIRM, P.C.  
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**CERTIFICATE OF SERVICE**

I hereby certify that I have served a copy of the foregoing on the following counsel of record, by placing a copy of same in the United States Mail, postage prepaid and properly addressed on this the 15<sup>th</sup> day of May, 2007:

Wallace D. Mills  
Attorney for the City of Montgomery  
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City of Montgomery  
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OF COUNSEL